

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:18-CR-230-O

DENISE CROS-TOURE (01)
MOHAMED TOURE (02)

GOVERNMENT'S AMENDED EXHIBIT LIST

<u>EXHIBIT NUMBER</u>	<u>SPONSORING WITNESS</u>	<u>DESCRIPTION OF EXHIBIT</u>	<u>IDENTIFIED</u>	<u>OFFERED</u>	<u>ADMITTED</u>
1.	Bridget Ajufo	Photo of D.D. with 2 small children	_____	_____	_____
2.	Bridget Ajufo	Photo of D.D. sitting on the stairs	_____	_____	_____
3.	Christine Ajufo	Photo of D.D.	_____	_____	_____
4.	Christine Ajufo or Leslie Dompka	Map of defendants' neighborhood	_____	_____	_____
5.	Christine Ajufo	Photo of D.D.	_____	_____	_____
6.	Kimberly Villa	Photo of D.D.	_____	_____	_____
7.	Maladho Diallo or D.D.	Photo of D.D. from visa	_____	_____	_____
8.	Maladho Diallo or D.D.	Diallo family photo	_____	_____	_____
9.	Maladho Diallo or D.D.	Diallo family photo	_____	_____	_____
10.	Maladho Diallo or D.D.	Diallo family photo	_____	_____	_____

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11.	Maladho Diallo or D.D.	Diallo family photo	_____	_____	_____
12.	Maladho Diallo or D.D.	Diallo family photo	_____	_____	_____
13.	Maladho Diallo or D.D.	Diallo family photo	_____	_____	_____
14.	Maladho Diallo or D.D.	Diallo family photo	_____	_____	_____
15.	Maladho Diallo or D.D.	Diallo family photo	_____	_____	_____
16.	D.D.	Photo of defendants' children, Cros-Toure's sister, and D.D.	_____	_____	_____
17.	D.D.	Photo of defendants' children, Cros-Toure's sister, and D.D.	_____	_____	_____
18.	D.D.	Photo of defendants' children, Cros-Toure's sister, and D.D.	_____	_____	_____
19.	D.D.	Photo of Saran Toure with twin beds	_____	_____	_____
20.	D.D.	Photo of Saran Toure's bedroom with queen sized bed	_____	_____	_____
21.	D.D. or Anthony Meehan	Photo of R. Toure's bedroom with purple walls	_____	_____	_____
22.	D.D. or Anthony Meehan	Photo of R. Toure's bedroom with purple walls	_____	_____	_____

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23.	D.D. or Anthony Meehan	Photo of R. Toure's bedroom	_____	_____	_____
24.	D.D.	Photo of R. Toure's bedroom with partially painted wall	_____	_____	_____
25.	D.D.	Photo of mattresses in defendants' garage	_____	_____	_____
26.	D.D. or Katy Wade or Bridget Ajufo	Photo of D.D. sitting on stairs	_____	_____	_____
27.	D.D.	Photo of storage bin in defendants' garage	_____	_____	_____
28.	D.D.	Photo of storage bin in defendants' garage	_____	_____	_____
29.	D.D.	Photo of D.D. near a pond with two of defendants' children	_____	_____	_____
30.	D.D.	Photo of D.D. near a pond with two of defendants' children	_____	_____	_____
31.	D.D.	Photo of D.D. with short hair	_____	_____	_____
32.	D.D.	Photo of D.D. with short hair	_____	_____	_____
33.	D.D.	D.D. holding R. Toure	_____	_____	_____
34.	D.D.	Photo with R. Toure	_____	_____	_____
35.	D.D.	Photo with son of Djana Cros	_____	_____	_____

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36.	D.D. or Anthony Meehan	Photo of Tom Thumb near defendants' house	_____	_____	_____
37.	D.D. or Mashid Golbarani	Photo of Starbucks near defendants' house	_____	_____	_____
38.	D.D. or Anthony Meehan	Photo of shopping center near defendants' house	_____	_____	_____
39.	D.D. or Anthony Meehan	Photo of shopping center near defendants' house	_____	_____	_____
40.	D.D. or Anthony Meehan	Photo of shopping center near defendants' house	_____	_____	_____
41.	D.D. or Anthony Meehan	Photo of shopping center near defendants' house	_____	_____	_____
42.	D.D. or Anthony Meehan	Photo of shopping center near defendants' house	_____	_____	_____
43.	D.D. or Anthony Meehan	Photo looking at shopping center near defendants' house from Bicentennial Park	_____	_____	_____
44.	D.D. or Anthony Meehan	Photo looking at shopping center near defendants' house from Bicentennial Park	_____	_____	_____
45.	D.D.	Photo of counter in defendants' kitchen	_____	_____	_____
46.	D.D.	Photo of table in defendants' kitchen	_____	_____	_____
47.	D.D. or SSA Keith Knowles	Flashcards made by D.D.	_____	_____	_____
48.	D.D. or SSA Keith Knowles	Photo of flashcards made by D.D.	_____	_____	_____

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49.	D.D. or SSA Keith Knowles	Photo of flashcards made by D.D.	_____	_____	_____
50.	D.D.	Photo of D.D. with Ahmed Toure at cross-country event	_____	_____	_____
51.	D.D.	Photo of D.D. with Timou Toure at cross-country event	_____	_____	_____
52.	D.D.	Photo of birthday party for defendants' children	_____	_____	_____
53.	D.D.	Photo of birthday party for defendants' children	_____	_____	_____
54.	D.D.	Photo of birthday party for defendants' children	_____	_____	_____
55.	D.D.	Photo of birthday party for defendants' children	_____	_____	_____
56.	D.D.	Photo of birthday party for defendants' children	_____	_____	_____
57.	D.D.	Photo of birthday party for defendants' children	_____	_____	_____
58.	D.D.	Photo of birthday party for defendants' children	_____	_____	_____
59.	D.D.	Photo of birthday party for defendants' children	_____	_____	_____
60.	D.D.	Photo of birthday party for defendants' children	_____	_____	_____
61.	D.D.	Photo of birthday party for defendants' children	_____	_____	_____

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62.	D.D.	Photo of birthday party for defendants' children	_____	_____	_____
63.	D.D.	Photo of birthday party for defendants' children	_____	_____	_____
64.	D.D.	Photo of birthday party for defendants' children	_____	_____	_____
65.	D.D.	Photo of birthday party for defendants' children	_____	_____	_____
66.	D.D.	Photo of birthday party for defendants' children	_____	_____	_____
67.	D.D.	Photo of defendants' mantle with Christmas stockings	_____	_____	_____
68.	D.D.	Photo of D.D. with Defendant Cros-Toure and children at a beach	_____	_____	_____
69.	D.D.	Photo of D.D. at the beach	_____	_____	_____
70.	D.D.	Photo of bookshelves and photographs in defendants' house	_____	_____	_____
71.	D.D.	Photo of dresser in defendants' bedroom	_____	_____	_____
72.	D.D.	Photo of D.D. with baseball hat on	_____	_____	_____
73.	D.D.	Photo of Ahmed Toure with braces	_____	_____	_____
74.	D.D.	Photo of Marcel Toure with braces	_____	_____	_____

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75.	D.D.	Photo of Sara Toure with braces	_____	_____	_____
76.	D.D.	Photo of Timou Toure with braces	_____	_____	_____
77.	D.D.	Photo of R. Toure with braces	_____	_____	_____
78.	D.D. or Matt Markovich	Photo of D.D. with Swollen cheek	_____	_____	_____
79.	D.D.	Photo of D.D.'s right ear	_____	_____	_____
80.	D.D.	Photo of D.D.'s left ear	_____	_____	_____
81.	D.D.	Photo of boombox at defendants' house	_____	_____	_____
82.	D.D.	Photo of boombox at defendants' house	_____	_____	_____
83.	D.D.	Photo of D.D.'s right arm	_____	_____	_____
84.	D.D.	Photo of D.D.'s right arm	_____	_____	_____
85.	D.D.	Photo of D.D.'s left arm	_____	_____	_____
86.	D.D.	Photo of D.D.'s left arm	_____	_____	_____
87.	D.D. or Katy Wade or Anthony Meehan	Aerial photo of playground at Bicentennial Park, 2003	_____	_____	_____
88.	D.D. or Katy Wade or Anthony Meehan	Photo of baseball field at Bicentennial Park	_____	_____	_____

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89.	D.D. or Katy Wade or Anthony Meehan	Photo of baseball field at Bicentennial Park	_____	_____	_____
90.	D.D. or Katy Wade or Anthony Meehan	Photo of baseball field at Bicentennial Park	_____	_____	_____
91.	D.D. or Katy Wade or Anthony Meehan	Photo of baseball field at Bicentennial Park	_____	_____	_____
92.	D.D. or Katy Wade or Anthony Meehan	Photo of baseball field at Bicentennial Park	_____	_____	_____
93.	D.D. or Katy Wade	Aerial photo of Bicentennial Park, 2001	_____	_____	_____
94.	D.D.	Photo of covered bench at Bicentennial Park	_____	_____	_____
95.	D.D.	Photo of covered bench at Bicentennial Park	_____	_____	_____
96.	D.D.	Photo of bathroom at Bicentennial Park	_____	_____	_____
97.	D.D.	Photo of thank you note to D.D.	_____	_____	_____
98.	D.D. or Mary Thomson	Instagram post by Mary Thomson with D.D.	_____	_____	_____
99.	D.D. or Anthony Meehan	Photo of fashion shoot with Anthony Meehan	_____	_____	_____

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100.	D.D. or Anthony Meehan	Photo of fashion shoot with Anthony Meehan	_____	_____	_____
101.	D.D.	Photo of D.D.'s torn T-shirt	_____	_____	_____
102.	D.D. or SSA Keith Knowles	D.D.'s torn T-shirt	_____	_____	_____
103.	D.D. or Matthew Markovich	Audio recording of defendants speaking to D.D.	_____	_____	_____
104.	D.D. or Matthew Markovich	Audio recording of defendants speaking to D.D.	_____	_____	_____
105.	D.D. or SSA Keith Knowles	D.D.'s backpack	_____	_____	_____
106.	D.D. or SSA Keith Knowles	D.D.'s purse	_____	_____	_____
107.	D.D. or SSA Keith Knowles	Photo D.D. brought with her when she escaped	_____	_____	_____
108.	D.D. or SSA Keith Knowles	Photo D.D. brought with her when she escaped	_____	_____	_____
	D.D. or SSA Keith Knowles	Photo D.D. brought with her when she escaped	_____	_____	_____
109.	Hassane Diane	Photo of the defendants' home	_____	_____	_____
110.	Hassan Diane	Photo of D.D.	_____	_____	_____
111.	Hassan Diane	Photo of D.D. with defendants' family	_____	_____	_____

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112.	Leslie Dompka	Photo of D.D.	_____	_____	_____
113.	Mashid Golbarani or D.D.	Photo of D.D. with members of youth group	_____	_____	_____
114.	Mashid Golbarani or D.D.	Photo of D.D. with Members of youth group and tree	_____	_____	_____
115.	Mashid Golbarani or D.D.	Video of D.D. with Members of youth group	_____	_____	_____
116.	SSA Knowles	D.D. NIV Applicant	_____	_____	_____
117.	SSA Knowles	D.D. Passport/Visa	_____	_____	_____
118.	SSA Knowles	Copy of D.D. Passport/ Visa	_____	_____	_____
119.	SSA Knowles	Stamped I-94 Form from D.D. Passport (original)	_____	_____	_____
119A.	SSA Knowles	Stamped I-94 Form from D.D. Passport (copy)	_____	_____	_____
120.	SSA Knowles	TECS-PCQ Database Screenshot	_____	_____	_____
121.	SSA Knowles	Texas DPS Datatbase Screenshot	_____	_____	_____
122.	SSA Knowles	NNSV Database Screenshot	_____	_____	_____
123.	SSA Knowles	NNSV Database Screenshot	_____	_____	_____

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124.	SSA Knowles	Comm. Air Border Crossing For D.D. in 2000	_____	_____	_____
125.	SSA Knowles	Air France No. 36 Passenger List	_____	_____	_____
126.	SSA Knowles	Comm. Air Border Crossing For Boumbouya & Cros	_____	_____	_____
127.	SSA Knowles	Djana Cros NIV Applicant	_____	_____	_____
128.	SSA Knowles	Comm. Air Border Crossing For Hadja Toure	_____	_____	_____
129.	SSA Knowles	Passenger List for Delta Flight No. 48	_____	_____	_____
130.	SSA Knowles	Carroll ISD School Records	_____	_____	_____
131.	SSA Knowles	Flower Mound Medical Medical Records	_____	_____	_____
132.	SSA Knowles	Texas A&M Dental Records	_____	_____	_____
133.	SSA Knowles	Audio Recording of Agents' Mohamed Toure	_____	_____	_____
134.	SSA Knowles	DOJ/D.Ed. Letter	_____	_____	_____
135.	SSA Knowles	DOJ/D.Ed. Fact Sheet	_____	_____	_____
136.	SSA Knowles	Transcript of Audio Recording, Part 1	_____	_____	_____
137.	SSA Knowles	Transcript of Audio Recording, Part 2	_____	_____	_____
138.	Matthew Markovich or D.D.	Video from D.D.'s iPod Touch IMG 2180.MOV	_____	_____	_____

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139.	Matthew Markovich or D.D.	Video from D.D.'s iPod Touch IMG 2191.MOV	_____	_____	_____
140.	Matthew Markovich or D.D.	Video from D.D.'s iPod Touch IMG 2791.MOV	_____	_____	_____
141.	Matthew Markovich or D.D.	Video from D.D.'s Kindle VID_20160323_092421.mp4	_____	_____	_____
142.	Matthew Markovich or D.D.	Video from D.D.'s Kindle IMG_2699-3.MOV	_____	_____	_____
143.	Matthew Markovich or D.D.	Video from D.D.'s Kindle VID_20151120_080222.mp4	_____	_____	_____
144.	Matthew Markovich or D.D.	Video from D.D.'s Kindle VID_20160813_091856.mp4	_____	_____	_____
145.	Darryl Mayhew	Southlake Police Report	_____	_____	_____
146.	Anna Mason	Translation of audio recording	_____	_____	_____
146A.	Anna Mason	Transcript of audio recording	_____	_____	_____
147.	Anthony Meehan or Katy Wade or Leslie Dompka	Photo of outside of defendants' house	_____	_____	_____
148.	Anthony Meehan or Katy Wade or Leslie Dompka	Photo of outside of defendants' house	_____	_____	_____
149.	Anthony Meehan or Katy Wade or Leslie Dompka	Photo of outside of defendants' house	_____	_____	_____

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150.	Anthony Meehan or Katy Wade or Leslie Dompka	Photo of outside of defendants' house	_____	_____	_____
151.	Anthony Meehan or D.D.	Photo of Anthony Meehan at D.D.	_____	_____	_____
152.	Arnetta Shams	Messenger Communications For Aug. 10-11	_____	_____	_____
153.	Arnetta Shams	Messenger Communications For. Aug. 12	_____	_____	_____
154.	Arnetta Shams	Messenger Communications For Aug. 15-16	_____	_____	_____
155.	Arnetta Shams	Messenger Communications For Aug. 17	_____	_____	_____
156.	Arnetta Shams	Photo of D.D.	_____	_____	_____
157.	Arnetta Shams	Photo of D.D.	_____	_____	_____
158.	Arnetta Shams	Photo of D.D.	_____	_____	_____
159.	Derrick Shepherd	Wage & Hour Table 1	_____	_____	_____
160.	Derrick Shepherd	Wage & Hour Table 2	_____	_____	_____
161.	Derrick Shepherd	Wage & Hour Table 3	_____	_____	_____
162.	James Showers	Letter from Mohamed Toure	_____	_____	_____
163.	James Showers	Letter from Mahon & McDonald	_____	_____	_____
164.	Mary Thomson	Instagram Photo of D.D.	_____	_____	_____
165.	Mary Thomson	Audio of June 23 Voicemail of D.D.	_____	_____	_____

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166.	Mary Thomson	Audio of July 11 Voicemail of D.D.	_____	_____	_____
167.	Mary Thomson	Text Message on July 11	_____	_____	_____
168.	Mary Thomson	Audio of July 12 Voicemail of D.D.	_____	_____	_____
169.	Mary Thomson	Text Message on Aug. 8	_____	_____	_____
170.	Mary Thomson	Audio of Aug. 9 Voicemail of D.D.	_____	_____	_____
171.	Mary Thomson	Cell Phone Screenshot Aug. 13	_____	_____	_____
172.	Mary Thomson	Audio of Aug. 15 Voicemail of D.D.	_____	_____	_____
173.	Mary Thomson	Cell Phone Screenshot Aug. 15	_____	_____	_____
174.	Mary Thomson	Cell Phone Screenshot Aug. 16-17	_____	_____	_____
175.	Katy Wade	Photo of her former home, 540 Briarridge Rd.	_____	_____	_____
176.	Katy Wade	Photo of her former home, 540 Briarridge Rd.	_____	_____	_____
177.	Katy Wade	Photo of her former home, 540 Briarridge Rd.	_____	_____	_____
178.	Katy Wade	Photo of her former home, 540 Briarridge Rd.	_____	_____	_____
179.	Katy Wade	Photo of her former home, 540 Briarridge Rd.	_____	_____	_____

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180.	Katy Wade	Photo of her former home, 540 Briarridge Rd.	_____	_____	_____
181.	Katy Wade	Photo of Sara Toure	_____	_____	_____

Respectfully submitted,

ERIN NEALY COX
UNITED STATES ATTORNEY

s/ Rebekah J. Bailey
REBEKAH J. BAILEY
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CERTIFICATE OF SERVICE

I hereby certify that on January 3, 2019, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a Notice of Electronic Filing to the following parties: Scott Palmer, Brady Wyatt, and David Finn, who have consented in writing to accept this Notice as service of this document by electronic means.

s/ Rebekah J. Bailey
REBEKAH J. BAILEY
Trial Attorney